

RICARDO M. GONZALEZ
ATTORNEY AT LAW
California State Bar No. 98993
101 W. Broadway, Suite 1950
San Diego, California 92101
Telephone: (619) 238-9910
Fax: (619) 238-9914

Attorney for Defendant
Carlos Quintero-Lopez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE MARILYN L. HUFF, JUDGE)

UNITED STATES OF AMERICA,
Plaintiff,

v.

CARLOS QUINTERO-LOPEZ,
Defendant.

Criminal Case No. 07cr3214-H

Date: February 4, 2008
Time: 2:00 P.M.

**NOTICE OF MOTIONS AND
MOTIONS FOR DISCOVERY AND
TO BRING FURTHER MOTIONS**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on February 4, 2008, at 2:00 P.M., or as soon thereafter as counsel may be heard, defendant CARLOS QUINTERO-LOPEZ, by and through his counsel, Ricardo M. Gonzalez, will respectfully move the Court for an order to grant the motions as set forth below.

MOTIONS

Defendant CARLOS QUINTERO-LOPEZ, by and through his counsel, Ricardo M. Gonzalez, hereby moves this Court, pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure, the *Jencks* Act (18 U.S.C. § 3500), *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny, the Fourth, Fifth, and Sixth Amendments to the Constitution of the United States, and the general supervisory powers of this Court, for an Order compelling the Government to disclose, or in the case of tangible evidence, to produce for inspection and

1 copying, all evidence and information in the possession, custody or control of the Government
2 which may be favorable to the defendant, or material on the issue of guilt or innocence, or which
3 could lead to material evidence, or evidence or information which could be useful in the
4 examination of witnesses at trial; and for disclosure and inspection of the information requested
5 in the attached memorandum of points and authorities.

6 The defense further moves for an order to bring further motions in the event it becomes
7 necessary after receipt of all discovery.

8 These motions are based upon this notice of motions, the accompanying memorandum
9 of points and authorities, the records and files in the instant case, and on any and all other
10 matters that may be presented to this Court prior to or at the time of the hearing of said motions.

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12 Dated: January 25, 2008

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14 *s/Ricardo M. Gonzalez*
15 RICARDO M. GONZALEZ
16 Attorney for Defendant
17 Carlos Quintero-Lopez
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